Enaex

CODE OF ETHICS

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DEAR COLLABORATORS,

I am pleased to present this Code of Ethics, a document of great value for the importance for all of us at Enaex, a company that for more than 100 years has demonstrated its unalterable sense of ethics, social responsibility, and respect for human dignity.

As a subsidiary of the Sigdo Koppers Group, we are committed to this Code, with its principles and values. We are responsible for ensuring that the document is well understood and complied with for the benefit of the Company and all those who are related to it.

We understand the permanent challenge of growth and development of our customers' products and services with high standards of safety, quality and reliability. This, and a high sense of ethics in decision making must be constant factors in our work practices.

All of us who work at Enaex must be a faithful reflection of the principles and rules that govern us, being an example of conduct, responsibility and professionalism. This Code of Ethics is ours, therefore, I invite you to get involved with its content and make it the navigation chart of our steps in Enaex.

Juan Andrés Errázuriz Domínguez
Chief Executive Officer
Enaex Group

1. INTRODUCTION

The purpose of this Corporate Code of Ethics is to present the vision, mission, values and principles of the Company, and state its commitment to promote ethical behavior in its labor relations, commercial operations and, in general, in all actions involving Enaex, its collaborators and/or advisors, regardless of the physical location where they carry out their activities and functions.

The Corporate Code of Ethics is a document that establishes a set of rules that regulate the behavior of the company's employees. This defines an ethical framework of principles, values, and behaviors that must govern the work performance and behavior of directors, collaborators and/or advisors, which is mandatory for all its members, with the purpose of integrating Enaex's mission, values and principles in all our activities.

This code will help maintain a line of behavior for all members of the organization, in order to to provide a positive work environment to its collaborators and/or advisors, so that they can relate in the best possible way with clients, suppliers, private and public institutions and the community in general. The achievement of this commitment depends on each and every member of Enaex.

2. SCOPE

This Corporate Code of Ethics is mandatory for directors, officers, senior managers, chief executive officers and in general for all employees of Enaex S.A. and subsidiaries. It is the responsibility of each and every one of them to read, know, and strictly comply with this code, signing a "Declaration of Receipt", once delivered.

The Code does not replace or supersede other internal policies and/or procedures, nor does it supersede legal aspects. It complements and integrates with them. This Code is a complement to the work contracts, to the internal regulations of order, hygiene and safety and to the rules and procedures that regulate the performance of functions by directors, collaborators and/or consultants, which are their responsibility to know and comply with.

Any questions you may have regarding this code should be referred to your immediate supervisor or to the Enaex Ethics Committee. This code will be included in the company's website.

The company reserves the right to modify the present code, at any time or circumstance, which will be communicated to all members of Enaex S.A. and subsidiaries.

3. ENAEX'S VISION, MISSION AND VALUES

VISION

- Becoming the preferred premium blasting solutions partner in all major mining regions.

MISSION

- Growing together with our customers, supplying Ammonium Nitrate, associated chemicals, and high-quality services to the mining industry.
- Delivering world-class standards in safety, reliability and innovative services.
- Having a global presence with leadership in Latin America.
- Generating value for our shareholders and employees.
- Being recognized as a company that respects the surrounding communities and the environment.

VALUES

- We put the **safety and integrity of people** in the first place.
- We are **environmentally** responsible.
- We are committed to the **social development of the communities** in which we operate.

- We have a **vocation for service.**
- We are empathetic and **solve your needs.**
- We understand the relationship with our customers as a **Partnership.**
- Our passion is to **deliver exceptional value-added solutions**
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- We strive for **the highest standards of technological and service quality.**
- We deliver on our **commitments.**
- We work as a team with **high accountability and honesty.**

- We develop in our people **the audacity in the search for solutions.**
- **We take risks** to solve problems with resignation.
- We have a **long-term view.**

4. STATEMENT OF PRINCIPLES, GUIDELINES AND RULES OF BUSINESS CONDUCT

COMPANY PRINCIPLES

Excellence

We finish everything we started in the right way.
The value of excellence implies the sum of efficiency, continuous improvement, and motivation in what is being done, which generates a final result of quality and gives the person or persons who perform it, an additional value to their work that makes a notable difference with their peers.

Integrity

We are recognized by our actions.

Integrity is conceived as transparency, uprightness, and probity, acting consistently according to our values and treating everyone equally.

Commitment

Everything we start, we feel it is ours.

Commitment is the certificate of guarantee of our work, the high sense of duty, the fulfillment of our obligations in the different aspects of our lives, is to make the Company part of us.

Teamwork

Let us become part of our company.

All of us in the organization are committed to achieving the objectives of our work. Teamwork generates the necessary synergy to do the job efficiently and with quality.

Perseverance

Even when we encounter difficulties in our work, we make every effort to fulfill our commitments.

Perseverance is doing everything necessary to achieve a goal. Enaex does everything necessary to comply with the commitments acquired, whether with its customers, suppliers or collaborators, achieving satisfaction regarding the goods or services rendered.

Consequence

If we commit to something, we do it in line with the organization's values, and if something unforeseen occurs that prevents us from fulfilling it, we communicate it in a timely manner.

Enaex performs its actions in accordance with its values and principles. Every time we assume a responsibility, is in good faith and on the basis of the commitments assumed, directing efforts to the achievement of the objectives. If an unforeseen event occurs, it is communicated in a timely manner, avoiding affecting the interests of the rest.

Respect and dignity

We always look at the other person's situation, from their point of view. We look at the other from what he is and from what he says.

Respect means valuing others, respecting their authority and considering their dignity. In this way, we contribute to the growth and development of each one of the members of Enaex. Respect is an absolute guarantee of transparency and creates an atmosphere of cordiality and security; it allows the acceptance of the limitations of others and the recognition of the virtues of others.

Honesty

We base our relationships with others on the truth.

One of the qualities we look for and demand the most from people is honesty. This value is essential for human relations to develop in an environment of trust and harmony, as it guarantees support, security, and credibility in people.

Responsibility

If we accept a job, we become responsible for the duties and obligations it entails.

It corresponds to the conscious act of assuming the consequences of words, decisions, and commitments, and, in general, of the acts freely and voluntarily performed, not only when their results are good and gratifying, but also when they are adverse or undesirable. Responsibility is also to do in the best way what corresponds to us, with effectiveness, quality, and commitment.

5. BUSINESS CONDUCT GUIDELINES

All employees must comply with their professional obligations, with unrestricted subjection to the current legal order and aligned with Enaex's vision, mission, and values, and must:

- Cultivate within the Company, a healthy coexistence and mutual respect among all members, and develop good human relations with special interest..
- Comply fully with the provisions set forth in the legislation in force, this Code of Conduct, this Code of Ethics, the Internal Rules of Order, Hygiene and Safety, the instructions and policies issued by the Board of Directors and its management in accordance with this Code of Ethics.
- Know, apply and transmit the values and principles that sustain the being and doing of the company group.
- Protect the image and prestige of Sigdo Koppers, Enaex, and its subsidiaries, as the basis of legitimacy within the business environment.
- Practice fellowship and loyalty, as values that animate the spirit of the members of the company.
- Maintain transparency and probity in all the company's actions, in accordance with the laws in force, and internal regulations.
- Protect the dignity of their co-workers and respect individual and cultural differences, gender, ethnicity, religion, ideology, or other.
- Provide our customers and suppliers with a friendly, diligent, and timely treatment, permanently contributing to the fulfillment of Enaex's mission and vision.

6. RULES OF CONDUCT

Conflict of interest

A conflict of interest occurs when a situation arises in which a person may favor personal and/or third parties' interests whom it seeks to privilege, in any way, affecting the objective exercise of its functions and the interests of the Company.

A conflict of interest is considered to exist, for example, from the moment that a decision adopted in the the performance of an employee's duties is affected or interfered with by a situation of personal or third party benefit, unrelated to the interests of Enaex and/or its clients. Therefore, all persons related to Enaex, whether directors or employees, must act in the corporate interest and must refrain from putting their own interests before those of the Company in the performance of their duties.

Confidential information

Confidential information of the Company is understood as information or knowledge created, or acquired by the Company controlled by Enaex, which the company considers should be protected from inappropriate public communication. Each of Enaex's employees must ensure that the information under their direction and/or control is adequately protected and not disclose it, either for their own benefit or for purposes unrelated to the Company, even when their contract has ended.

Non-discrimination

At Enaex, all people will be treated equally; no one will be discriminated against for reasons of gender, marital status, age, religion, race, political opinion, social and economic class, pregnancy, language, dialect, ethnic origin, nationality, sexual preference, or disability.

Anticorruption

Enaex opposes all kinds of corruption, including extortion, bribery, and kickbacks. It does not tolerate the practices of business seeking to gain advantage through the use of undue or improper means. No employee and/or consultant is authorized to engage in activities that may compromise the organization, in fact or appearance, with corrupt acts.

Alcohol and illicit drug use

Each employee of the company is responsible for taking the appropriate measures to avoid accidents at work, diseases, and must contribute to a safe and healthy work environment. This obligation includes responsible behavior with respect to alcohol and drug use, and employees are required to report to work in adequate mental and physical condition to perform their job duties satisfactorily. It is strictly forbidden to be under the influence of alcohol or any drug, to sell, use, manufacture, or distribute any drug during working hours and on company premises. It is permitted to use medications in the workplace, with or without a prescription, only if it does not affect the employee's ability to perform his or her essential functions efficiently and safely.

Relationship with Relatives and Couple Formation

Any relationship with family members or the formation of partners within the company must be reported in a timely manner in order to ensure that there are no conflicts of interest. In the event that a partner relationship is formed within the company, this situation must be dealt with by the Corporate Ethics Committee to resolve the conflict situation if it exists, for example: subordinate relationships between partners, partners or family members in corporate management, etc.

Sexual and labor harassment

Sexual harassment includes any unwelcome sexual suggestion or innuendo, request for sexual favors, or other unwelcome sexual advances; verbal or physical conduct of a sexual nature, which interferes with work, conditions employment or creates an intimidating, hostile or offensive work environment.

Some behaviors that constitute sexual harassment include:

- Unwelcome sexual advances.
- Verbal conduct of a sexual nature.
- Physical conduct - touching someone unnecessarily or offensively.
- Impeding or blocking a person's movement.
- Displaying sexually suggestive objects or pictures.

At Enaex, any type of sexual harassment is absolutely forbidden and administrative measures will be taken in the event of any of the above cases of complaints filed, investigated, and substantiated

Gifts and invitations

Giving or receiving gifts or entertainment invitations may create a conflict of interest, or appearance of this, in certain circumstances. Given this, collaborators, directors, senior executives, or managers must not give or receive gifts and invitations from third parties, when they could reasonably be perceived as incentives or commitment, or when such action could inconvenience or affect the good image and reputation of Enaex.

However, it is acceptable to give or receive gifts, as long as they: are unsolicited and of moderate value (less than 70 USD); are in conformity with the circumstances; are not part of a continuous series of gifts from the same source; do not create an appearance of conflict of interest and do not constitute a violation of applicable laws. Under no circumstances shall gifts or entertainment be offered to domestic or foreign government officials.

Health, safety, and environment

Health, safety and environmental protection are the company's primary objectives. The company strives to develop and provide products and services that have no undue environmental impact and are safe for their intended use, efficient in the consumption of energy and natural resources, and can be recycled or disposed of safely.

All employees must carry out their tasks and responsibilities in compliance with current legislation and the industry standards relating to health and safety in the workplace and the prevention of environmental pollution.

Customer Relationship

The commitment to customer satisfaction should be reflected in the respect of their rights and in the constant search for solutions that satisfy their interests, always in accordance with Enaex's vision, mission, and values.

In order to preserve the highest degree of trust on the part of our customers, Enaex adheres to a policy of treating our customers with the utmost care. All information of a commercial and business nature obtained from its commercial relations, as confidential property of the clients. Enaex will not disclose information related to these businesses or their results without their consent. Exceptions are cases in which a disclosure has been requested by the client orhas been legally ordered. This commitment will continue even after the conclusion of the labor or commercial relationship.

Relationship with Suppliers

The relationship between employees and our suppliers must be maintained under strict independence. We do not tolerate arbitrary discrimination in the hiring of our suppliers, or abusive practices contrary to current regulations or our vision, mission and values.

The selection and contracting of suppliers should always be based on technical, professional, and ethical criteria. The selection of proposals must be based on objective factors, such as competence, opportunity, price, and quality. The selection procedures must be transparent, established prior to the selection and demonstrable before Enaex's superior authorities.

In the event that, in compliance with the foregoing, it is decided to hire a supplier or contractor that is related to the Company, strict compliance must be made with the applicable regulations on related party transactions. For these purposes, the contractor or supplier shall be required to declare, prior to contracting, whether it is a person related to Enaex or its Parent Company.

- We will not maintain relationships with suppliers that do not comply with the laws and regulations in force, in particularly in labor, safety, and environmental matters, or about which there is any reasonable doubt as to their probity or ethical principles.
- Under no circumstances may these decisions be influenced by favors, gifts, invitations, loans or services of any nature. Financial settlements, reports, controls and billings must correctly and faithfully reflect transactions with customers, suppliers and contractors.

Relationship with Collaborators

Enaex people should take special care in those situations where they must act under the name of Enaex, by the nature of their position or by express delegation. Therefore, they should refrain from acting under the name of Enaex S.A. or subsidiaries when they have not been authorized to do so and be careful when interacting with government officials and public authorities, for which it will always be necessary to verify that it is within their attributions to interact with these authorities representing the company.

Relationship with Communities

Enaex has as a priority to maintain good relations with the communities, becoming a contribution in the places where it operates and with the people with whom it interacts, always in accordance with our vision, mission, and values described above.

We will ensure that our communications are fluid and transparent, and we will strive to maintain our integrity in the commitments we make to the communities in which the Company operates.

Relationship with Authorities

Relations with State authorities and institutions shall be based on open, transparent, and objective forms of communication, and in full compliance with Enaex's values. Therefore:

- We will respond in a timely and correct manner to the requirements and acts of authority, particularly with respect to inspections, inquiries and interrogations, cooperating in accordance with the corporate values set forth in this Corporate Code of Ethics.

- Any contact with authorities in connection with legislative, regulatory or administrative activities will be done in a transparent manner, in strict compliance with current regulations and our values.
- Any action that could legally affect Enaex before authorities, public officials, the media, or supervisory bodies must comply with the legal framework in force and have the corresponding approvals.
- All collaborators must ensure that any request for information from regulatory agencies, is channeled in a timely manner to the appropriate department.
- In the event of court summons or court orders, the employee must first consult with the General Manager or top executive in the area, to receive guidance on how to proceed.

7. CORPORATE REPUTATION

Every employee must take care of the good name and reputation of Enaex, always acting in accordance with our vision, mission and values.

- Collaborators may act on behalf of Enaex or its related persons to the extent that have the necessary legal or conventional faculties and have been duly authorized by the Board of Directors, the General Management, or their corresponding departments.
- It is a violation of this Code of Ethics for an employee to act without proper authorization, or outside of the circumstances described in the policies or instructions duly issued.

It is considered a violation of this Corporate Code of Ethics to use company stationery, company letterhead, company resources or the symbols of Enaex for personal communications in such a way as to mislead the recipients as to the nature of such communication. Likewise, in private acts that employees perform on their own account, they may not make statements or perform acts that may be interpreted in the sense that such acts are performed on behalf of the Company.

It is recommended, to the extent appropriate and without disturbing their legitimate freedom of association, that every employee who is to assume positions in trade, social, political or other types of institutions, to inform their actions in a timely manner, always taking care not to induce the impression that such participation is made on behalf of Enaex when this is not the case.

No employee may take on positions or responsibilities in other companies or institutions in violation of their legal and contractual duties with Enaex.

8. INFORMATION MANAGEMENT

8.1 Accuracy of Information

All information used or produced by our employees in the course of their duties must be treated in an upright way. The Company is fully compliant with accounting, tax, securities market, antitrust and any other applicable regulations.

All reports, and information communicated internally within Enaex or to the authorities, the market or third parties must be complete and correct.

All employees must cooperate in maintaining information accurate, and must inform their managers of all instances when there is reason to believe that the information does not comply with the standards established by Enaex.

8.2 Safeguarding of Information

Enaex or its respective subsidiary or related persons is the owner of all the information created by its collaborators. This is maintained even after the termination of the labor or professional relationship, regardless of its format or type of information. Therefore, all employees must:

- Maintain custody and discretion of all information and documents of Enaex under its direction.
- Keep confidential all information that has not been disclosed to the market or is not public in compliance with Enaex's Information Safeguarding Procedure.
- Communicate in a timely manner to their management any situation that may damage the trust or credibility of Enaex.
- Consult with the corresponding managers in case of doubt as to whether information should be considered confidential or does not deserve special treatment.
- Return all confidential information to the corresponding managers upon termination of employment.
- Refrain from using or disclosing company information for their own benefit or for the benefit of third parties.
- Never attempt to gain access to information that you are not authorized to access, whether it be information of the company or third parties.
- Never disclose or induce others to disclose confidential information of former employers or other third parties.
- Cooperate to keep the information duly safeguarded, informing the managers of all instances where there is reason to believe that the information does not comply with the standards established by Enaex in accordance with this Corporate Code of Ethics.
- In the case of information related to the securities market, fully comply with the Management Manual of Market Information.

It should be noted that the misuse of information, in addition to being a breach of ethics, may give rise to legal liability for the organization and for the person who incurs in such conduct.

8.3 Reservation of Information

Employees who access or process proprietary information are responsible for keeping it confidential and for disclosing it only to those who should know it, by reason of their functions or position.

In particular, all confidential information, including the following, must be kept confidential:

- Personal data and private information of employees, customers, suppliers, contractors, consultants and others commercially linked to Enaex: this includes names, addresses, telephone numbers, dates of birth and commercial background.

- Enaex's strategic information is the information that gives the company competitive advantages that is not yet appropriate to disclose to the market (commercial, financial, operational, technical or legal information of interest to competitors, new projects, agreements with customers and suppliers, customer and employee records, litigation, among others).
- Privileged information: Information about Enaex and its related companies, its business or securities issued by such entities that have not been disclosed to the market, the knowledge of which, due to its nature, may vary the price of such securities. The Reserved Facts referred to in Enaex's Market Information Management Manual and the Company's financial statements are also privileged information as long as they are not disclosed.

In addition to maintaining confidentiality, no employee may use the information to obtain direct or indirect advantages, for their own benefit or for the benefit of third parties, nor make any type of transaction on securities issued by Enaex or its related companies while in possession of privileged information.

Information subject to confidentiality may be disclosed only with the authorization of the Board of Directors or the Chief Executive Officer to third parties or persons not related to Enaex.

9. ASSET CARE

9.1 General Principles

All employees must make appropriate use of the organization's assets, using them exclusively for the purpose of execution of Enaex's own functions, in the established manner and not allow them to be used for personal benefit, or for any third party not belonging to the organization.

Company assets are not only equipment, materials, buildings, vehicles, tools, furniture, and machinery but also, among others, information, databases, systems, media, trademarks, patents, intellectual property, commercial secrets, business plans, blueprints, e-mails and work product of employees (a condition that remains unchanged when they leave the company).

As regulated by the Industrial Property Law, trade secrets are understood to be any knowledge about products or industrial processes, whose secret character provides the Company with an improvement, advance or competitive advantage. Therefore, all employees must:

- Ensure the proper custody of the Company's assets, especially those under its responsibility.
- Preserve the value of the assets, as well as their efficient use, working condition or usefulness, seeking to maximize their capacity and useful life.
- Protect assets from loss, misuse, damage, theft or sabotage.
- Exercise prudence in the administration of the company's financial resources.
- Strictly comply with the procedures established for the use of assets.
- Back up all transactions made with company resources.
- Render a timely account of the resources received in the fulfillment of its responsibilities.
- Use Enaex's trademarks, patents and other intellectual property in accordance with the regulations in force for the purpose of preserving the rights held over them.

Likewise, it is forbidden for employees, to:

- Use the assets of Enaex or its related persons for personal benefit or for third parties, without authorization from the corresponding authorities of Enaex in accordance with this Corporate Code of Ethics.
- Allow third parties to use or have access to the assets of the company or its related persons, without authorization from management or the Board of Directors, granted in accordance with this Corporate Code of Ethics.
- Remove documents, information or software, without proper authorization, even if the employee has generated or created such document, information or software (especially that contained in computers or electronic work devices).
- Unlawfully acquire business secrets of Enaex or its related companies, including the removal by any means of such information, and the disclosure or exploitation of business secrets of Enaex or its related companies to which it has had legitimate access, without the prior authorization of the Company.
- Use vehicles of the Company or its related persons for purposes other than those the Company has duly authorized
- Use assets of the company or its related persons for purposes unrelated to their work, except when expressly authorized to do so.
- Use money, goods or services for political, charitable or other contributions, except as otherwise provided by law. The Company's management is not responsible for the financial statements of any of its subsidiaries, except as permitted and duly authorized by the Board of Directors or the Chief Executive Officer, or in accordance with the policies approved by the latter.
- Use software, trademarks or other industrial property that is not owned by Enaex and of which Enaex has the corresponding license or authorization of use.

9.2 Information and Communication Systems

This refers to computer and other assets and systems made available to employees for the purpose of communicating and performing their work, such as computers, communication systems, cell phones, software, etc.

Contributors acknowledge that all data files created, received, or sent through the data processing systems of Enaex are the property of the Company, which may access them, use them for its own benefit or destroy them in accordance with its policies. Consequently, employees recognize that in the event of using the company's information and communication systems (e.g., computers, telephones, and e-mail) for personal communications or documents, such information shall not be subject to the information reserve referred to in the "privacy and personal information" section.

All employees have the obligation to protect the confidentiality of Enaex information and its information and Communication systems.

Therefore, collaborators are prohibited to:

- Breach the confidentiality of communications or access systems or communications to which they are not authorized.
- Allow or facilitate unauthorized access to information systems to third parties or share their password or other means of access to them, even with other collaborators.

- Copy or share with third parties the software provided to them.
- Use information and communication systems to send or forward content that violates the regulations of this Corporate Code of Ethics or other Enaex policies.
- Perform acts that may violate the security or proper functioning of the information and communication systems, such as unauthorized use of software, disabling antivirus, failure to follow protocols or instructions, connecting unauthorized devices, etc.

10. CONFLICT OF INTEREST

10.1 Duty to disclose conflict of interest

It is the duty of every employee to perform their duties in a fair and equitable manner, resolving their conflicts of interest, real or apparent, in their relations with other collaborators or with clients, suppliers, contractors, communities or authorities by reason of their position.

Conflict of interest: A situation in which the integrity of an action is influenced by an interest that is incompatible with that of the Company, affecting the objective exercise of the individual‘s work.

The interest may be of any nature, whether economic or personal, to the extent that it affects or may seem to affect the unbiased character of the employee to comply with their duties. The Company understands that it is the duty of all employees to act in a fair and equitable manner in their relations with other employees or with customers, suppliers, contractors, communities and authorities, taking care of the forms and results of their conduct.

Thus, a conflict of interest may arise from a relationship with another collaborator or with a supplier, contractor, customer, or competitor of Enaex or their related persons, as defined in Article 100 of the Securities Market Law, or of ownership or management with any person or company that is related as a supplier, contractor, customer or competitor or its related persons, or provides services or receives benefits from the activities of such supplier, contractor, customer or competitor of Enaex or its related persons.

Employees must take care not only to adequately resolve any substantive conflict of interest, but also to comply with the forms, so as not to cause the appearance of conflicts of interest that may damage its own reputation, the image of the Company, of any of its collaborators or of any supplier, contractor, client, or competitor of Enaex.

The Conflict of Interest Management Procedure approved by the Company's Board of Directors establishes the Company's definitions of conflict of interest and the procedures to be followed by all employees in relation to them. It is noted that the existence of any situation that requires the application of the conflict of interest procedure does not constitute, by itself, a violation, but must be duly declared so that the Company can take appropriate and adequate measures to prevent situations that affect its image or the relationship with its collaborators.

10.2 Duties of Employees in the event of a Conflict of Interest

It is the duty of every collaborator to:

- Comply with all regulations regarding conflicts of interest established in the Corporations Law, the Company's internal codes and procedures, including (by way of example) the Conflict of Interest Management Procedure approved by the Company's Board of Directors, as well as the regulations of the Financial Market Commission, free competition regulations, and other applicable regulations.
- Timely report or seek guidance from their manager on the existence of any conflict of interest, whether real or apparent, that occurs in their dealings with any collaborator, clients, suppliers, contractors, competitors, or those who have business relations of any kind with Enaex or any of its related persons.
- Inform their managers or the Human Resources Management, if they know of family members in the process of being selected to work at Enaex.
- Not promote or favor applications of direct relatives to Enaex.
- Report to their management any infringement of the conflict of interest regulations of which they are aware.
- Refrain from making investments that may compete or conflict with Enaex's activities, including investments or providing services to competitors (investments that represent ownership of less than one percent (1%) in the company in question do not constitute a conflict of interest). Not to offer, request or receive any type of payment or collection, outside of what is established in the respective contract, from clients, suppliers, contractors or related third parties, to ensure preferences or in exchange for benefits, prizes or incentives.
- Not engage in outside activities or services that divert time and energy away from your obligations with Enaex, or that require work to be performed during their working day.
- Not make investments in shares or securities while having knowledge of or access to privileged information.
- Comply with restrictions on investing in securities issued by the Company or its entities contained in Enaex's Market Information Management Manual and, in general, comply strictly with the aforementioned Manual.
- Not use the quality of Enaex collaborator to obtain personal advantages.
- Not give or receive gifts or entertainment that may create a conflict of interest, real or apparent, or when could reasonably be perceived as an incentive or commitment, or when such action could inconvenience or affect the good image and reputation of Enaex.
- Not give or promise gifts, prizes or attentions to public officials, national or foreign, or to directors, executives and employees of entities with which Enaex or any of its related persons are related.

11. FREE COMPETITION

Enaex promotes and respects free competition, which is a fundamental value that should govern all the areas of the national economy. Competition stimulates efficiency and creativity, allowing us to establish fair and equitable relationships with those with whom we do business. Competitive actions are governed by the company's commercial objectives and by considerations specific to the market in which it operates.

Employees should bear in mind that the duty to respect free competition exists not only with respect to our competitors for the provision of our products and services throughout the territory of the Republic, but also with respect to the goods and services supplied to us by our suppliers and contractors, especially with respect to markets, locations or activities in which we have a dominant position for the acquisition of such supplies in our country.

Therefore, the collaborators:

- Must refrain from adopting any type of written or oral agreement, explicit or implied, with competitors, customers or suppliers that violate the Chilean rules of free and fair competition.
- Are prohibited from taking advantage of Enaex's position in the national or local market, to demand predatory or unfair business terms dealings with customers, suppliers or contractors.
- Shall not share non-public information with competitors or other third parties in a manner that could be construed they serve as a basis for allowing tacit coordination among competitors.
- Will have as a guideline in this matter the Antitrust Compliance Manual and its annexed Instructions for the Communication Exchange.
- Should always consult with the Compliance Officer on antitrust matters (Corporate Controller) when preparing and signing agreements and contracts, or when performing actions that could be detrimental to healthy competition. These doubts or questions regarding antitrust regulations and the matters indicated in the Compliance Manual should be sent to the following email address: consulta.librecompetencia@enaex.com.

12. CRIME PREVENTION

Criminal Liability of Legal Entities

Pursuant to Laws No. 20,393 and 21,227, legal entities may incur criminal liability for certain crimes, when committed in the interest of such legal entity or for its benefit, by its owners, controllers, directors, executives, workers, representatives or other service providers.

The offenses that may generate criminal liability for legal persons are:

1. Financing of Terrorism.
2. Asset Laundering.
3. Bribery of a Public Official.
4. Receipt.
5. Incompatible Negotiation.

6. Bribery between Private Parties.
7. Misappropriation.
8. Unfair Administration.
9. Water Pollution.
10. Processing, Support, Transformation, Transportation, Commercialization and Storage of prohibited seafood products.
11. Illegal and extractive fishing in areas of management and exploitation of marine resources without being holder of the rights.
12. Processing, or storage of marine resources, for which there is no evidence of their legal origin and that correspond to banned or overexploited products.
13. Non-observance of isolation or other preventive measure, ordered by the health authority, in the case of epidemic or pandemic.
14. Obtaining the benefits established in Law No. 21.227 on Employment Protection in excess of what is established in the Law.

In order to prevent the criminal liability of any Enaex entity, as well as to comply with the requirements of the ethical standards and good business conduct established in its policies, and in compliance with Law 20.393, Enaex has implemented a Crime Prevention Model (CPM) and appointed a Crime Prevention Officer, responsible for ensuring compliance with such regulations.

The CPM will be applicable to any new offense that may be considered in the future as a ground for criminal liability of legal entities.

In consideration of the above, it is the duty of all employees to be aware of it, and strictly comply with all the provisions that make up the Company's Crime Prevention Model.

13. MECHANISM FOR MONITORING COMPLIANCE WITH THE CODE OF ETHICS

The company will ensure the communication and understanding of this Code of Ethics, through its publication on its website. and signature of receipt, in addition to other dissemination mechanisms that may be carried out.

Ethics Committee

The main objective of the Ethics Committee is to promote within the organization that the activities aimed at the company's business activities are aligned with the Code of Ethics, and permanently reflect the mission, vision and values declared by the company.

Likewise, the Ethics Committee will collaborate in the evaluation of the operability of this Code and its updating, in order to make its applicability more effective and relevant.

Guidance for employees' actions

When an employee is faced with a situation of which they are not sure if it is ethical behavior, they can ask themselves the following questions as a guide for their actions:

- Is it correct for Enaex S.A. and subsidiaries?
- Is it consistent with Enaex S.A.'s values and my own?
- Is it legal? Is it ethical?
- Is it something I want to be responsible for?

If, after answering these questions, the employee still has doubts about how to act in the event of a specific request, you may consult your immediate supervisor or the Ethics Committee through the Vice President of Human Resources.

Complaint Process

It is the duty of all Enaex employees to report any case that could constitute a breach of this Code of Ethics, a report that must be made in a timely manner, so that the facts, evidence or tests to be performed do not lose validity or effectiveness. For each report, the company will ensure the anonymity of the complainant, if they so request.

In order to be accepted for processing, the complaint must be substantiated, documented and made in good faith. If the complaint does not comply with the requirement of being substantiated, the Ethics Committee may initiate an investigation to review the facts denounced, if they are serious enough and there are sufficient elements to initiate such investigation.

Employees may report non-compliance with this code, as well as any irregularities or illegal acts through the channels provided for this purpose:

- Complaints phone: (56) 2 28377696
- E-mail: canaldedenuncias@enaex.com
- Web: www.enaex.com

The complaint will be investigated by the Ethics Committee in accordance with the established procedures and instances in its operating regulations.

Disciplinary measures

Any non-compliance with the Corporate Code of Ethics will be investigated and disciplinary measures will be determined depending on the offense. Disciplinary measures to be applied may include, but are not limited to, oral or written reprimands, warnings, suspension and termination of employment and/or service contract as appropriate.

In addition, disciplinary action will be taken against any person who violates the Corporate Code of Ethics, such as (i) persons who fail to exercise reasonable care to detect a breach, (ii) persons who are required to disclose information and withhold material information about the breach, and (iii) supervisors who condone or permit the breach or attempt to retaliate against employees and/or consultants for reporting breaches or defaulters.

Notwithstanding the foregoing, a violation of this code may include the filing of a criminal complaint with the competent authorities, if it corresponds.

13. VALIDITY

This Code shall become effective upon approval by the Board of Directors of Enaex S.A. and shall be reviewed annually by the Board of Directors, depending on the needs.

Enaex